

ORIGINAL

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Biennial Regulatory Review -- Amendment of)
Parts 0, 1, 13, 23, 24, 26, 27, 80, 87, 90) WT 98-20
95, 97, and 101 of the Commission's Rules)
to Facilitate the Development and Use of)
the Universal Licensing System in the)
Wireless Telecommunications Services.)

TO: The Commission

COMMENTS OF THE
THE W5YI GROUP, INCORPORATED

We hereby submit formal comments pursuant to Section 1.415 of the Commission's Rules (47 C.F.R. §1.415) in response to the Notice of Proposed Rulemaking (the Notice), released by the Commission's Office of Managing Director on March 18, 1998. The proposed rule amendments facilitate the implementation of the Commission's new Universal Licensing System (ULS) initiative. ULS is a consolidated FCC licensee database, application filing system, and processing system for all Wireless Radio Services. ULS supports electronic filing of all applications by applicants and licensees in the Wireless Radio Services, and provides full public access to licensing information.

Qualifications of the Commenter

I, Frederick O. Maia, W5YI have been a licensed Amateur Radio operator for more than four decades and am a member of the Quarter Century Wireless Association - member No. 14730 - (25 years licensed), the Old Old Timers Club - member No. 3405 - (40 years licensed), the Society of Wireless Pioneers - Life Member- (ex-professional wireless

telegrapher) and the *Radio Club of America* - Member 1987, Fellow 1997 (the nation's oldest wireless "by invitation only" radio organization - formed in 1909.) W5YI was trained as a military radio operator in the 1950's. I am the author of hundreds of radio magazine articles, publish a twice-a-month communications-oriented newsletter and am co-author of the 492-page "*General Radiotelephone Operator Plus*" license manual which covers commercial radio operator examinations and licensing. I believe I am qualified to speak out on the subject of radio operator examinations and licensing procedures.

W5YI Group Licensing Activity

The *W5YI Group, Inc.*, (W5YI), is the umbrella corporation which through its subsidiaries *W5YI-VEC, Inc.*¹, (a tax exempt educational organization under section 501(C)(3) of the Internal Revenue Code of 1986) and *National Radio Examiners* conducts amateur and commercial radio operator training, examinations and electronic filing of applications.

In 1984, our group was the first to be accepted by the FCC as a *Volunteer Examiner Coordinator* (VEC) on a national basis and in 1993, the first to be certified as a *Commercial Operator License Examination Manager* (COLEM).²

¹ A VEC serves as the interface between the Federal Communications Commission (who issue the amateur radio licenses) and the Volunteer Examiners (who administer the written and telegraphy examinations.) Basically the VECs develop and provide license examination materials and instructions, accredit VEs, receive the exam session results from the VE teams and electronically file the FCC Form 610 license applications. The VEC System consists of approximately 30,000 accredited volunteer examiners who hold senior amateur radio operator licenses.

² There are currently fifteen VEC and seven COLEM FCC-approved organizations. The W5YI-VEC, Inc. and National Radio Examiners are now the second largest VEC and COLEM organizations. The ARRL/VEC is the largest VEC with an approximate 55% share. The W5YI-VEC handles about 35% of all amateur radio testing. The remaining fourteen VEC's and account for the remaining 10%. The ARRL/VEC does not handle commercial radio operator examinations.

The W5YI VEC, Inc., has over 700 volunteer amateur examiner (VE) and 300 commercial radio (CE) examining locations throughout the world. Over 21,000 amateur and commercial radio examiners have been accredited by our organization. Several of our commercial radio operator license examination points are located at colleges and various technical schools. For example, *National Radio Examiners* administers maritime radio license examinations to cadets at the U.S. Merchant Marine Academy at Kings Point, N.Y. Examination activities are financed by sharing expense reimbursement with our examiners.

The W5YI Group is the only U.S. organization that conducts both amateur and commercial radio examinations and electronically processes the license applications giving us wide experience with both amateur and professional radio operator licensing procedures.

Over the past thirteen years, our organization has administered nearly 600,000 radio operator written and telegraphy examination elements to 350,000 examinees and authorized the Commission to issue over 200,000 amateur and commercial radio operator licenses. All of our training, examination, and licensing activities take advantage of the newest state-of-the-art electronic technology available.

An radio license applicant served by the W5YI Group is thus able to study for his/her radio license examination at a personal computer, be either examined at the PC or through the use of computer-generated examinations, have their amateur examination results and licensing information transported to us via computer which is electronically filed directly into the Commission's license data base. We are constantly looking for ways to automate and speed up the licensing function and the use of "paper" is kept to an absolute minimum.

In addition, the W5YI VEC, Inc., mails Amateur Service license renewal notices to all amateurs whose ten year license term is about to expire. VEC handling of Amateur Service renewal and modification applications was authorized by a special waiver Order issued July 16,

1996 by the FCC in Gettysburg, PA.

Since this waiver authorization, the W5YI-VEC has mailed out over 100,000 amateur license renewal notices containing the needed license renewal forms, an expensive function that the FCC previously handled. The renewal forms are returned to the W5YI-VEC rather than to the FCC so that they may be electronically filed. We estimate that this amateur license renewal service alone saves the Commission more than \$100,000 in printing, mailing, postage and manual application processing costs annually. The cost of this program is voluntarily financed by the applicant in the form of a \$6.00 donation. During the past year, more than 25,000 amateur radio operator license renewals were electronically filed by our organization.

In the interest of efficiency, speed and economy, we believe that all amateur service renewal, replacement and modification Form 605 applications should be filed electronically and not mailed to Gettysburg where they would have to be manually keyed and processed. The Commission has made much progress toward ending their licensing backlog and mandatory electronic filing of all applications will further this trend. In a nutshell, we believe the rules³ should require electronic filing of applications wherever possible.

The W5YI Group not only files renewal and modification applications electronically. All new and upgraded amateur radio applications⁴ and eight different commercial radio applications⁵ are also filed electronically "computer-to-computer" directly into the

³ See proposed rules in Section 97.21, 97.29, and 97.519(b)(3.) (47 C.F.R. § 97-21, §97.29 and §97.519(b)(3.))

⁴ These include new (first time licensed), license class upgrades, renewals, call sign changes, and name/address changes.

⁵ The eight different radio authorizations filed electronically by the W5YI Group are the Marine Radio Operator Permit, General Radio Telephone Operator License, First, Second and Third Class Radiotelegraph Operator Certificates, the Global Maritime Distress and Safety System Operator and Maintainer licenses and the Ship Radar Endorsement.

FCC's license data base. The W5YI Group does not send any "paper" of any kind to the Commission's Gettysburg licensing facility and has not for more than two years.

In addition, the W5YI-VEC offers an innovative electronic filing program to its amateur volunteer examiners - the only VEC organization to do so. VEs in the field may choose to electronically file their amateur applications with the W5YI-VEC. By doing so, our VEs are able to offer better service to their "customer" by speeding up receipt of new amateur radio licenses. This procedure saves mailing timer of examination session paperwork to the VEC from the VE exam site which is frequently in a remote location. The W5YI-VEC screens the computer application file from the VE team and immediately electronically files the applications with the FCC. The computer file from the VE team is later compared with the paper examination documents⁶ (once received) to insure that the filing was properly handled.

The computer software code needed to electronically file all amateur and commercial radio operator applications with the FCC were written by the W5YI Group "in house." The FCC's data processing department in Washington, D.C. furnished us with their required record/field formats and we wrote computer batch-file programs to those specifications. All applications are filed directly into the FCC's data base without any manual handling by the Commission.

When the FCC authorized amateurs to use special one-by-one⁷ station call signs to commemorate special events in the Amateur Service, it was the W5YI Group that developed the common data base software for the amateur community and installed it on the Internet. The 1x1 data base is accessible through the use of any World Wide Web

⁶ See Section 97.519(b) (47 C.F.R. §97.519(b))

⁷ A one-by-one amateur station call sign has a format of one prefix letter (K, N or W), one geographical numeral (zero through 9) and one suffix letter (A through Z except the letter X. For example: W1A is a one-by-one station call sign.)

(Internet) "browser." The Special Event Call Sign System permits FCC-approved coordinators to authorize the use of these call signs on a temporary basis.

Universal Licensing System:

The Commission is to be applauded for developing and implementing the Universal Licensing System as proposed in Docket No. WT 98-20. The Notice proposes to consolidate revise, and streamline FCC rules governing license application procedures for all radio services licensed by the FCC's Wireless Telecommunications Bureau (WTB) including the Amateur (Part 97) and Commercial (Part 13) Radio Services.

The amateur service was the first to be automated and its electronic filing success has been a model for other radio services to follow. A consolidated, publicly-accessible licensing data base with mandatory electronic filing will indeed make the Commission's wireless licensing process not only more efficient, but will provide faster and better service to the public and the Commission at less cost.

The W5YI Group, at present, is only involved in examinations, application processing, electronic filing and licensing of amateur (Part 97) and commercial (Part 13) radio operator licensing. While we want to expand our future activities to include other radio services, we will confine our comments to those two services.

FCC Form 605, Schedules "C" and "D."

Our understanding is that only five different application forms will be used in the Universal Licensing System, FCC Forms 601 through 605. The FCC Form 605 (Quick-form application) is to be used as a short form application for wireless applicants who are not presently required to submit extensive technical data to receive a license.

Amateur and commercial radio operators are among the applicants who are planned to be using the FCC Form 605.

In addition, to the five FCC forms, one of five "schedules" are to be included with the application. Schedule "C" is to be used by applicants for amateur radio operator licenses and Schedule "D" for commercial radio licenses. FCC Form 605 and (Amateur) Schedule "C" will replace four FCC Form 610 versions.⁸ FCC Form 605 together with Schedule "D" will replace three FCC Form 750 range forms.⁹

There are six different amateur¹⁰ and twelve different commercial¹¹ radio operator authorizations. All six of the amateur and nine of the commercial radio operator licenses require passing written and/or telegraphy examinations.

While we note that Schedule "D" provides for each of these twelve authorizations, Schedule "C" does not provide for the six different

⁸ The four FCC 610 forms to be replaced are the current (1) FCC Form 610 Amateur Operator/Primary Station License application, (2) FCC Form 610-A Alien Amateur Radio Operator License application, (3) FCC Form 610-B Amateur Club or Military Recreation Station License application and (4) FCC Form 610-V Amateur Vanity Call Sign Application.

⁹ The three FCC Form 750 range forms that will be replaced are the (1) FCC Form 753 Restricted Radiotelephone Operator Permit, (2) FCC Form 755 Restricted Radiotelephone Operator Permit - Limited Use and the (3) Commercial Radio Operator License application.

¹⁰ The six amateur radio license classes are: Novice, Technician, Technician Plus (telegraphy), General, Advanced and Amateur Extra Class.

¹¹ The twelve commercial radio authorizations and their examination requirements are: Marine Radio Operator Permit (Element 1), General Radiotelephone Operator License (Element 1 and 3), Global Maritime Distress and Safety System (GMDSS) Operator (Element 1 and 7), GMDSS Maintainer (Element 1, 3 and 9), First Class Radiotelegraph Operator's Certificate (Written Elements 1, 5 and 6, Telegraphy Elements 3 and 4), Second Class Radiotelegraph Operator's Certificate (Written Elements 1, 5 and 6, Telegraph Elements 1 and 2), Third Class Radiotelegraph Operator's Certificate (Written Elements 1 and 5, Telegraphy Elements 1 and 2) and Ship Radar Endorsement (Element 8). A combination GMDSS Operator/Maintainer license requires passing Elements 1, 3, 7 and 9. There are no examinations associated with the Restricted Radiotelephone Operator Permit and the Restricted Radiotelephone Operator Permit - Limited Use.

amateur radio operator licenses or certification by three volunteer examiners as mentioned in new Section 97.509(I) (47 C.F.R. §97.509(I)) This is apparently an oversight since the license class is required to be in the license database for enforcement purposes. Each of the six license classes offer progressively increased operating and frequency privileges.

Furthermore, the new Schedule "C" does not provide for applicants applying for new or upgraded licenses, changing a station call sign to coincide with a new upgraded license class¹², the required statement concerning RF radiation safety¹³ or the *Physician's Certification of Disability*¹⁴. This may or may not be an oversight since this information may not be needed to be included in the new ULS licensee database.

Although not so stated, it may be the intention of the Commission to have these items appear on forms which are produced locally by the amateur/commercial radio operator VEC/COLEM examining community. There is a precedent for doing just that. For example, the FCC Rules require that (amateur radio) *Certificates of Successful Completion of Examination*¹⁵ (CSCE) and (commercial radio) *Proof of Passing Certificates* (PPC) be provided to examinees who successfully pass FCC radio license examinations but the Commission does not supply the form nor mandate its format. CSCE and PPC forms are developed by the VECs and COLEMs and all examiners universally recognize the examination

¹² See FCC Fact Sheet entitled, "Amateur Sequential Call Sign System."

¹³ Effective September 1997, the current FCC Form 610 application contains the following certification which is required from all radioamateurs: "I have READ and WILL COMPLY WITH Section 97.13(c) of the Commission's Rules regarding RADIOFREQUENCY (RF) RADIATION SAFETY and the amateur service section of OST/OET Bulletin Number 65."

¹⁴ See Section 97.505(10) (i) - (47 C.F.R. §97.505(10) (i))

¹⁵ See Section 97.509(1) (47 C.F.R. §97.509(1)) and Section 13.211(e) (47 C.F.R. §13.211(e)) of the Commission's Rules.

credit afforded by these forms even though all are slightly different in wording and format. All VECs file amateur radio operator applications electronically and the FCC never sees the original form since it is archived at the VECs office. It thus appears feasible that locally produced examination session forms could indeed be used by the VEC and COLEM Systems.

It might also be appropriate for the Commission to mandate that all forms used in the VEC and COLEM programs be the same as agreed upon by the majority of the licensing coordinators. For example, the Commission requires the VECs to collaborate on the development of a common question pool¹⁶ for use in examinations to insure that the questions appearing on the written examinations of all VECs are standardized.

Another option that we believe should be considered is to permit VECs and COLEMs to design their own combined FCC Form 605 and Schedule "C" containing only the information needed by the VEC and Universal Licensing System. This would permit an amateur or commercial radio applicant to apply for an examination and license on a single piece of paper. For example, information pertaining to Special Temporary Authority, Amendment/Withdrawal of Applications, Waivers/Exceptions, references to corporations, trusts and partnerships (only individuals as licensed as amateurs), etc., could be left off a VEC produced form.

Assuming, however, that these needed information collection items were inadvertently left off of Schedule "C", we have designed a new FCC 605 Schedule "C" Page 1 which includes the minimum items needed by the VEC System. The current Page 1 of Schedule C should be renumbered to Page 2. The new suggested Schedule "C" is contained at the end of these comments.

¹⁶ See Section 97.523 (47 C.F.R. §97.523.)

Mandatory electronic filing of applications

We strongly agree that all wireless applications should be filed electronically with no or as few exceptions as possible. Amateur service licensing was the first to be automated and it has greatly benefitted the VECs, the FCC, the applicant and (especially) the U.S. taxpayer. The key to this success has been electronic submission of applications which allows a digital copy to be available online to everyone almost instantly.

Depending upon the personnel workload and backlogs at Gettysburg, it previously took up to three months for amateur application information to be manually keyed in and a paper license processed and mailed. The procedure was particularly frustrating to first time licensed amateurs who were not permitted to begin their radio operation until they received their paper license document.

Today, amateur radio licensing is more efficient, faster and costs less. Amateur application information is now transmitted by VEC organizations "computer-to-computer" directly into the FCC data base and the license is automatically granted. What used to take three months at significant cost is now down to three days with little impact on the Commission's budget.

The importance of a paper license in the amateur service is now extremely minimal since the FCC posts daily license grants to the Internet. This information is consolidated into a relational data base by several amateur radio enthusiasts, organizations and suppliers who post the amateur service database information to their web sites.

It is VERY IMPORTANT that the FCC continue to make this relational data base information available to the VECs and the amateur community. Not only does the public republish this information on their Internet websites, the VEC System uses this data in conjunction with their own accounting systems to keep track of amateurs examined, examination sessions/locations, participating volunteer examiners,

examinations passed/failed, and so forth.

Neither the FCC nor the amateur community relies on a paper license document to confirm that the Commission has granted the applicant a license. As in most areas of society and business, modern technology is quickly making "paper" documents archaic. And with the constantly expanding popularity of personal computers, the Internet and the World Wide Web, people are now able to simply check an online database with a browser to see if the license has been granted.

Paper license documents in the amateur service -- and we suspect most radio services -- are not needed and represent an expensive, needless burden on the Commission and the U.S. taxpayer. If a paper document is wanted by an applicant, it can easily be made available for a fee from an authorized electronic batch-filer or the applicant can simply print out a page from the FCC database.

From a personal standpoint, I have been licensed more than 40 years but no one in authority has ever asked to see my license document. I did need a copy a year ago to provide to the Government of Jamaica so that I could operate my amateur radio equipment in that country under a bilateral reciprocal licensing arrangement. But this is the extreme exception and a copy could just as well have been provided by a supplier rather than the paid for out of the dwindling FCC budget. The FCC should permit approved batch-file electronic filers to use the FCC logo on the paper authorizations that they issue.

The bottom line: We see no reason why the Commission should issue paper licenses at all. Nearly all of the public has access in some way to a computer and a WWW browser. If license status needs to be confirmed, it easily can be checked online by almost anyone. Nearly every business, school, public library and one third of all U.S. private individuals now have access to the Internet and the World Wide Web. This penetration is certain to increase dramatically as the

Internet becomes an information necessity.

The FCC asked in the Notice whether consumer facilities should be maintained in the field offices and at the FCC's Washington, D.C. office to file application forms and to check license status. It certainly would not hurt, but we anticipate the wide availability of independent filing services and PCS everywhere will make this Government-provided service unnecessary and probably little used.

Another point that should be considered. Privatization of Government functions not only conserves declining federal budgets, it also results in jobs to the entities assuming the privatized function. It also rightfully transfers the cost of the service to those who reap the benefit rather than to all taxpayers.

The VEC System is a classic example of the advantages of a privatized Commission function. Up until 1984, the FCC administered all amateur radio operator license examinations at their field offices and FCC personnel frequently traveled to adjacent cities and states to conduct exam sessions. Even so, there were relatively few examination opportunities available and applicants sometimes had to wait several weeks or months for a Commission-administered exam opportunity to become available in their area. Traveling hundreds of miles to an FCC exam site was commonplace.

In the early 1980s, the FCC said that it cost \$7.26 for the Commission to administer and process the required examinations for an amateur radio license applicant. Based on approximately 40,000 applicants, this represented a cost of nearly \$300,000.¹⁷ And up until 1983, all license examinations were developed internally by the FCC, another costly expense.

¹⁷ In 1990, the number of persons administered amateur radio operator license examinations surpassed 100,000 persons. Had the Commission not privatized amateur examinations, the cost to the FCC would have exceeded \$1 million.

The Commission transferred the responsibility for developing, administering, processing and filing license examinations to the amateur community in 1984 and permitted volunteer examiners and their coordinators to recoup their expenses¹⁸ from the applicant.

Today, amateur radio operator license examination opportunities are widely available in most U.S. neighborhoods and through electronic filing, licensing backlogs have been entirely eliminated. "Auto-granting" of amateur radio operator licenses permit amateurs to get on the air faster since they no longer have to wait "weeks" for their paper license document to arrive.

In a nutshell, amateur radio licensing is now far more efficient at less cost to the U.S. taxpayer. This liability has been turned into an asset. Privatized amateur radio operator licensing has been a very big success for all concerned and a good example of how a "reinvented government" can indeed do more with less. Amateur service administration which previously resulted in hundreds of thousands of dollars in FCC expense now contributes to the U.S. economy. The W5YI Group paid corporate income taxes for the 1997 calendar year in "five figures." This success can and should be introduced in other wireless radio services.

While all new and upgraded amateur radio operator FCC Form 610 applications are electronically filed by the VEC System, the FCC rules still permit manual filing of modified, replacement or renewed applications. We agree with the Commission that these applications should also be filed electronically and the VECs have the capability to do so. The Commission has also proposed that amateur licensees may interactively file their own renewals and modifications.

¹⁸ The initial maximum amount permitted to be recovered from applicants was \$4.00 for examinations administered in 1984. This figure has been increased annually in small amounts based on inflation (increases in the Consumer Price Index.) The Commission currently permits the VEC System to recover \$6.39 from each amateur radio examinee.

As mentioned above, the W5YI VEC has now assumed the amateur license renewal notification service previously handled by the Commission. All renewal/modification applications received by the W5YI VEC are filed electronically the same day and usually appear in online databases within 24 hours after filing. This system has worked out very well and the National Conference of VECs¹⁹ has been able to finance their conference expenses through funds received from amateurs whose licenses have been renewed or modified -- another "plus" for electronic filing.

Taxpayer Identification Numbers (TIN)

The Commission has proposed that all persons filing wireless applications through the Universal Licensing System be required to submit a TIN. We agree that the TIN is a logical choice as a licensee identifier for the Universal Licensing System. Since all amateur and commercial radio operator licenses are issued to individuals, the TIN would be their 9 digit Social Security Number. The current identifier (or key) in the various sections of the current amateur service relational database is the amateur operator's station call sign.

There are six different amateur operator licenses. Each one is a progressive step up the licensing ladder. This causes applicants to submit further applications as they upgrade. At present, prior to filing an amateur application, the W5YI VEC electronically checks the information currently in the FCC data base to insure that the new data being submitted matches the information already on file. This is accomplished by entering the licensee's station call sign and "calling up" the licensee's record from our local copy the FCC amateur

¹⁹ The National Conference of VECs (NCVEC) is an organization whose membership is made up of all VECs who have entered into an agreement with the Federal Communications Commission to coordinate amateur radio operator examinations. The NCVEC also agrees on standardized examination procedures such as the requirement that VECs cooperate in maintaining one question pool for each of the written examinations. See Section 97.523 (47 C.F.R. §97.523.)

database. This database is updated every day by downloading the daily files from the Internet.

We have found this to be very important since applicants frequently submit subsequent application information which can be slightly different or their handwriting may be difficult to read. If the information is not the same, then different data on the same person can result. The simple addition of a nick name, the absence or presence of a middle initial or suffix can cause problems.

Furthermore, checking data contained on a new application against previously filed information serves as a local cross check to insure that applicant is the same and that the correct information is being electronically submitted to the Commission. Our system has been refined over the past fourteen years to the point where we can quickly and effectively batch file a great number of license applications with a minimum of errors.

The Commission said in the Notice that steps would be taken to prevent misuse and that TINs would not be available to the general public. The Commission should consider, however, making the TINs available to VECs so that they may be compared with information already on file. While VECs are not Commission employees, they do assist the Commission under a formal *Memorandum of Agreement*.

Unless the VECs have access to the current record, a thorough electronic comparison with existing application data would not be possible. In any event, we strongly feel that the current system whereby the Commission posts the licensing information daily to the Internet -- with or without the TIN being contained -- should be continued since this information is routinely posted by the public to many online website databases and is widely used by amateur applicants. Perhaps a special password-protected version with the TIN contained in the record could be made available to the VECs.

It is important that the Commission not make excessive changes to

the batch filing system currently in place. Most VECs have written their own computer software programs to interface their administrative needs to the current FCC data processing system and a massive change would adversely impact local procedures. To insure continuation of timely license grants, the FCC should furnish the VECs with revisions to the computer record format as soon as possible so that their batch filing software may be quickly rewritten.

Vanity Call Sign System

We note that the new FCC Form 605 and Schedule C also provide for amateur Vanity station call sign requests. The FCC's *Office of Managing Director* has recently proposed to reduce the Vanity station call sign fee over the ten year term of the license from \$50.00 to \$12.90. This lower cost should greatly increase the number of Vanity call signs issued by the Commission.

The FCC should consider including the needed fields in the batch file record so that Vanity call sign requests may be routinely handled. This will permit the VECs to electronically batch file these requests along with other new, renewal, and modified amateur radio applications. The regulatory fee associated with the Vanity call sign would be paid by the VEC to the FCC utilizing FCC Form 159 after payment is received from the applicant.

In any event, the Commission should require all Vanity call sign requests to be filed electronically. VECs or other electronic batch filers could provide this service to amateurs who do not have the capability to file electronically or the applicant could do it interactively online. We suggest that the last line of new Section 97.19(b) (47 C.F.R. §97.19(b)) be changed to read: "The application must be electronically filed using FCC Form 605 and Schedule C."

Assignment of initial call signs by VEC

We continue to believe that a new amateur's first station call sign could and should be issued by the VEC System. The systematic assignment of amateur station call signs is currently handled by the FCC. The advantage in having the initial station call sign assigned by the VEC would be to provide even faster service to new amateur radio applicants.

There have been times when the FCC's computer has been unavailable for long periods of time and applicants have become frustrated waiting for their station call sign so they could get on the amateur airwaves. Unlike existing amateurs who already have a call sign, new amateurs can not utilize their new privileges until they receive a station call sign. A side benefit to having new station call signs issued by the VEC is that applicants would not be telephoning the FCC's call center to obtain their call sign.

Applicants for new station call signs and licenses account for the greater majority of the examination activity performed by VECs. At the end of an examination session, the VE Session Manager could notify the VEC by electronic means of the identity of successful new applicants and the number of new station call signs that are needed. Certain Group D call sign blocks could be allocated to each VEC or the unused NA-by-3 block of call signs currently allocated to the amateur service in Section 2.302 (47 C.F.R. §2.302) but not used in the sequential call sign system could be allocated to VECs for use by new applicants.

The new call signs could be immediately posted to a public Web site located on the Internet. The applicant would be able to ascertain his/her new call sign by accessing the site. The VE Session Manager could also be notified by e-mail of the station call signs assigned or he/she could also access the public Web site.

The new call sign information would be part of the electronic

application data electronically forwarded to the FCC as authorized by Section 97.519(b) (3) (47 C.F.R. §97.519(b) (3)). An additional call sign field in the record transmitted to the FCC would be necessary and an ideal time to initiate this change would be when ULS is implemented.

There would be no additional charge to the applicant for this service. A voluntary fee could be paid by the applicant, however, if a paper license document is wanted.

Amateur reciprocal licensing arrangements

The Commission has proposed to authorize licensed foreign amateur radio operators from the 65 countries that have multilateral/bilateral (reciprocal) licensing arrangements with the United States to operate their equipment while on visits to the U.S. by rule. The current system requires submission of reciprocal permit application Form 610-A and issuance of an Alien Amateur Permit on FCC Form 610-AL.

We agree that there is little reason to license these individuals. An alternative, however, would be for private sector coordinators to list these individuals on an accessible online database similar to the Special Event Call Sign System²⁰.

We are confused by the deletion in new proposed Section 97.107(b) (4) (47 C.F.R. §97.107(b) (4)) of the reciprocal operating provision which precludes alien amateur operators from operating under a reciprocal arrangement if he/she holds an FCC-issued license. It was our view that this provision existed to prevent foreign operators from obtaining Extra Class privileges if they held an FCC license of a lesser class.

²⁰ See FCC Fact Sheet entitled, "Amateur Station Special Event Call Sign System."

Amateur service club, military and RACES stations

Club, military recreation and radio amateur civil emergency service (RACES) stations have unique station call signs. Unlike most amateur radio licenses, these authorizations carry no accompanying operator privileges. The trustee of the amateur club station, however, must meet certain license class standards to obtain a specific format call sign²¹.

The Commission proposes to utilize amateur radio organizations such as VECs to electronically file new and renewal club, military recreation and RACES applications. (RACES station licenses may be renewed but no new RACES station licenses are to be issued.)

The W5YI Group has two observations on club call signs. The current rules permit trustees of quasi-clubs to warehouse station call signs and the amateur club call sign program has been widely abused. We do not believe it appropriate to ask VECs or other batch filers to process and file these applications without a provision for reimbursement²². The Commission should allow voluntary donations such as permitted by the Order released July 17, 1996 allowing VEC organizations to electronically file amateur renewal and modification applications.

We believe this waiver should be expanded to include new and renewed club, military recreation and RACES stations. The W5YI Group currently asks for a \$6.00 donation to process and file amateur license renewals and modifications. The FCC's data base currently includes club, military and RACES stations and we could easily include them in our monthly renewal notification program.

We also believe that the abuse of the club call sign program

²¹ See FCC Fact Sheet entitled, "Amateur Station Vanity Call Sign System."

²² See proposed new Rule in Section 97.17(b)(2)) (47 C.F.R. §97.17(b)(2)) on page M-5 of the Notice.

would be reduced if a fee were associated with the application.

Miscellaneous

We note an error in the amateur radio operator license class mentioned in the new proposed Section 97.9 (Page M-4). The word "Technical" in "... , a Technical Class license granted before February 14, 1991, ... " should be changed to "Technician."

There is also a reference in a footnote on page O-19 of the Notice that refers to the ARRL/VEC and W5YI-VEC publishing and marketing license preparation materials. The line which reads "This publishing activity is separate from their VEC activity" is accurate but this separation is no longer required. The *Telecommunications Reform Act of 1996* (Public Law 104-104) removed many of the burdensome requirements previously imposed on the VEC System. The rule in Section 97.521(e) (47C.F.R. §97.521(e)) which previously precluded VECs from being engaged in the publication or distribution of license preparation materials was removed on February 28, 1996.²³

Commercial Radio Operators

We agree that all commercial radio operator applications including the permits and endorsements that do not require examinations²⁴ should be filed electronically. The W5YI Group's subsidiary, *National Radio Examiners* is an FCC-authorized Commercial Operator License Examination Manager (COLEM.) Even though not

²³ See Order (FCC 96-74) adopted by the Commission on February 28, 1996, entitled: "Amendment of Part 97 of the Commissions Rules to Conform the Amateur Service Rules to the Provisions of the Telecommunications Act of 1996."

²⁴ The *Restricted Radiotelephone Operator Permit (RP)* and the *Restricted Radiotelephone Operator Permit-Limited Use* do not require applicants to pass examinations.

required, *National Radio Examiners* currently files all commercial radio applications for which an examination is administered electronically with the Commission.

The Commission should permit COLEMs to also electronically file both *Restricted Radiotelephone Operator Permits*, plus all commercial radio operator renewal, replacement and duplicate licenses electronically and to charge a small additional fee for this service.

We believe that the *Temporary Operator Permit* section of FCC 605 Schedule "D" should be at the bottom of the form to allow this section to be separated from the top portion of Schedule "D" and retained by the applicant. The top portion of Schedule "D" along with FCC Form 605 should be mailed to the COLEM along with the appropriate fee so that it may be electronically filed.

The application fee and small added filing fee would be submitted to the COLEM who would forward the appropriate application fee²⁵ accompanied by an FCC Form 159 Remittance Advice to the FCC fee contractor.

Conclusion

The W5YI Group strongly supports the Commission's proposal to consolidate the numerous FCC licensing database into a single publicly accessible database. The plan to make electronic filing mandatory will provide faster and more efficient service to the applicant, Commission and public at less cost to the U.S. taxpayer.

The proposed Universal Licensing System is a shining example of what Vice President Al Gore was referring to in his 1993 Reinventing Government concept that "...works better, costs less, and gets results

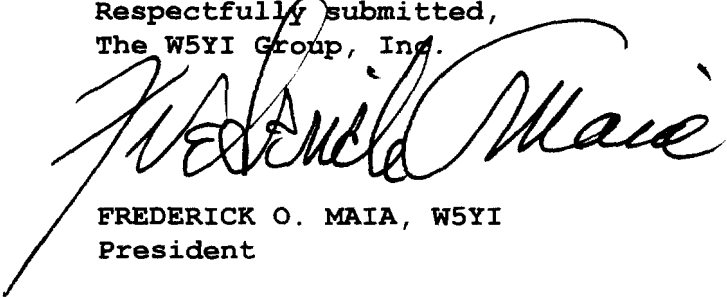
²⁵ The two lifetime *Restricted Radiotelephone Operator Permits* and all renewal, replacement or duplicate licenses carry a \$45 application (processing) fee. There are currently no regulatory fees associated with commercial radio operator authorizations.

Americans care about."

By utilizing modern technology, outsourcing the processing and electronic filing of wireless applications, and making it easier for people outside the FCC to access information - the Commission will indeed be able to provide better service at a time of rapid telecommunications growth, more responsibilities and declining agency budgets.

We have noticed unbelievable progress over the past five years in the upgrading, deregulating and streamlining of the FCC and the Commission is to be congratulated. An agency that was once behind the technological "eight ball" now operates on the "cutting edge."

Respectfully submitted,
The W5YI Group, Inc.



FREDERICK O. MAIA, W5YI
President

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APR 6 1998

Encl: Suggested Schedule C
to FCC Form 605.

**FCC 605
Schedule C**

**Schedule for Additional Data for
the Amateur Radio Service**

Approved by (OMB)
3060-xxxx
See instructions for
Public Burden Estimate

Part 1: AMATEUR OPERATOR/PRIMARY STATION LICENSE APPLICATION

To be completed by applicant (See instructions)

I HEREBY APPLY FOR (MAKE AN X IN THE APPROPRIATE BOX):

☐ **EXAMINATION** for a **new** license

☐ **EXAMINATION** for **upgrade** of my operator license class

☐ **CHANGE** my call sign **systematically**

I certify that:

I have READ and WILL COMPLY WITH Section 97.13(c) of the Commission's Rules regarding RADIOFREQUENCY (RF) RADIATION SAFETY and the amateur service section of OST/OET Bulletin Number 65 and its Supplement B.

Signature of applicant (Do not print, type, or stamp. Must match name on Form 605, Line 9)

X

Date Signed: _____

Part 2: TO BE COMPLETED BY ALL ADMINISTERING VEs

Applicant is qualified for operator license class:

- ☐ **NOVICE** Elements 1(A), 1(B), or 1(C) and 2
- ☐ **TECHNICIAN** Elements 2 and 3(A)
- ☐ **TECHNICIAN PLUS** Elements 1(A), 1(B), or 1(C), 2 and 3(A)
- ☐ **GENERAL** Elements 1(B), or 1(C), 2, 3(A) and 3(B)
- ☐ **ADVANCED** Elements 1(B), or 1(C) and 2, 3(A), 3(B) and 4(A)
- ☐ **AMATEUR EXTRA** Elements 1(C) and 2, 3(A), 3(B), 4(A) and 4(B)

DATE OF EXAMINATION SESSION
EXAMINATION SESSION LOCATION
VEC ORGANIZATION
VEC RECEIPT DATE

I CERTIFY THAT I HAVE COMPLIED WITH THE ADMINISTERING VE REQUIREMENTS IN PART 97 OF THE COMMISSION'S RULES AND WITH THE INSTRUCTIONS PROVIDED BY THE COORDINATING VEC AND THE FCC.

1st VEs NAME (Print First, MI, Last, Suffix)	VEs STATION CALL SIGN	VEs SIGNATURE (Must match name)	Date Signed
2nd VEs NAME (Print First, MI, Last, Suffix)	VEs STATION CALL SIGN	VEs SIGNATURE (Must match name)	Date Signed
3rd VEs NAME (Print First, MI, Last, Suffix)	VEs STATION CALL SIGN	VEs SIGNATURE (Must match name)	Date Signed

Part 3: PHYSICIAN'S CERTIFICATION OF DISABILITY - TO BE COMPLETED BY PHYSICIAN

I CERTIFY THAT I have read the Notice to Physician Certifying to a Disability, and that the person named on Line 9 of FCC Form 605 is severely handicapped, the duration of which will extend for more than 365 days beyond this date. Because of this severe handicap, the person is unable to pass a 13 or 20 words per minute telegraphy examination. I am licensed to practice in the United States or its territories as a doctor of medicine (M.D.) or a doctor of osteopathy (D.O.). I have considered the accommodations that could be made for this person's disability and have determined that even with accommodations, this person would be unable to pass a 13 or 20 words per minute telegraphy examination.

WILLFUL FALSE STATEMENT IS PUNISHABLE BY FINE AND IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001)

PATIENT'S RELEASE - Authorization is hereby given to the physician named above, who participated in my care, to release to the Federal Communications Commission any medical information deemed necessary to process my application for an amateur operator/primary station license.

PRINT PHYSICIAN'S NAME		
STREET ADDRESS		
CITY, STATE, ZIP CODE		
OFFICE TELEPHONE NUMBER ()		
PHYSICIAN'S SIGNATURE (DO NOT PRINT OR TYPE)	M.D. OR D.O.	DATE SIGNED
APPLICANT'S SIGNATURE (DO NOT PRINT OR TYPE)		DATE SIGNED